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 SKS OCULAR, LLC, SKS OCULAR 1, LLC,
 JASON SLAKTER, GLENN STOLLER

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JEANMARIE GUENOT,
 Plaintiff,

v.

SKS OCULAR, LLC, a Delaware limited
 liability company; SKS OCULAR 1, LLC, a
 Delaware limited liability company; JASON
 SLAKTER, an individual; GLENN STOLLER,
 an individual; and DOES 1-10, inclusive,
 Defendants.

SKS OCULAR, LLC, a Delaware limited
 liability company

Counter-Plaintiff,

v.

JEANMARIE GUENOT,

Counter-Defendant.

CASE NO.: CV 13 1875 (SI)

**JOINT STIPULATION AND
 [PROPOSED] ORDER FURTHER
 EXTENDING BRIEFING
 SCHEDULE RE PLAINTIFF'S
 MOTION FOR PARTIAL
 SUMMARY JUDGMENT AND FOR
 MODIFICATION OF PRETRIAL
 PREPARATION ORDER**

Before: The Honorable Susan Illston

Complaint Filed: April 24, 2013

Trial Date: August 25, 2014

1 Defendants SKS Ocular, LLC; SKS Ocular 1, LLC; Jason Slakter; and Glenn Stoller
2 (“Defendants”) and Plaintiff Jeanmarie Guenot (“Plaintiff”) (collectively referred to herein as the
3 “Parties”), by and through their undersigned counsel, hereby jointly enter into the following
4 Stipulation:

5 WHEREAS, Plaintiff filed a Motion for Partial Summary Judgment (the “Motion”) on
6 November 26, 2013;

7 WHEREAS, the Parties entered into a stipulation dated December 4, 2013 and entered by
8 the Court on December 5, 2013, which extended the briefing schedule for the Motion;

9 WHEREAS, the Parties entered into a stipulation dated December 15, 2013 and entered
10 by the Court on December 16, 2014, which further extended the briefing schedule for the Motion
11 so that Plaintiff could depose SKS Ocular, LLC and SKS Ocular 1, LLC’s 30(b)(6) designee,
12 Jason Slakter (“Slakter”), prior to filing her Reply brief to the Motion;

13 WHEREAS, the parties mutually agreed to schedule Slakter’s deposition for January 31,
14 2014, but Slakter is now unable to appear for his deposition on that date due to a serious medical
15 condition;

16 WHEREAS, the first mutually agreeable date to reschedule Slakter’s deposition is
17 February 13, 2014;

18 WHEREAS, the Parties have agreed to further extend the briefing schedule for the
19 Motion so that Plaintiff may have Slakter’s 30(b)(6) deposition testimony in preparing her Reply
20 brief to the Motion;

21 WHEREAS, the Parties have agreed to further extend the deadline by which to complete
22 non-expert discovery, currently set for March 14, 2014 to March 31, 2014, so that, following the
23 deposition of Slakter, any further discovery may be timely issued prior to the deadline;

24 WHEREAS, the Parties have agreed to further extend the deadline by which to designate
25 experts, currently set for March 14, 2014 to April 11, 2014, so that the Parties may have
26 sufficient time to consider their expert designations following the close of non-expert discovery;
27 and
28

1 WHEREAS, to conserve resources and avoid unnecessary expense, the Parties have
2 agreed to reschedule the Case Management Conference, currently scheduled for February 28,
3 2013, to the same day on which the Court holds a hearing on the Motion, which shall be held at
4 the Court's earliest convenience following briefing on the Motion.

5 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
6 subject to approval of the Court, that:

- 7 1. The 30(b)(6) witness of the corporate defendants will be produced for deposition on
8 February 13, 2014.
 - 9 2. Plaintiff's Reply brief on her Motion for Partial Summary Judgment must be filed by
10 February 25, 2014 and will be served electronically and by overnight delivery.
 - 11 3. The hearing on Plaintiff's Motion for Partial Summary Judgment currently scheduled
12 for February 28, 2014 shall be held at the earliest convenience of the Court following
13 the completion of the briefing on the Motion, and the Case Management Conference
14 currently scheduled for February 28, 2014 shall take place on the same day as the
15 hearing on Plaintiff's Motion for Partial Summary Judgment.
 - 16 4. The deadline for completion of non-expert discovery shall be extended to March 31,
17 2014.
 - 18 5. The deadline for the Parties to complete their expert designations shall be extended to
19 April 11, 2014.
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1 Dated: January 30, 2014

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

3 By: /s/ Koray J. Bulut
Koray J. Bulut

Attorneys for Defendants
SKS OCULAR, LLC, SKS OCULAR 1,
LLC, JASON SLAKTER, and GLENN
STOLLER


7 Dated: January 30, 2014

SV EMPLOYMENT LAW FIRM

9 By: /s/ Kevin A. Mills
Kevin A. Mills
Attorneys for Plaintiff
JEANMARIE GUENOT

14 Based upon the above stipulation and for good cause appearing, IT IS SO ORDERED.

16 Dated: 1/31, 2014

17 By: 
HONORABLE SUSAN ILLSTON
United States District Court

21 Mo + CMC set
23 3/14/14 @ 9 + 3, respectively

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Koray J. Bulut, am the ECF User whose identification and password are being used to file the **Joint Stipulation and [Proposed] Order Further Extending Briefing Schedule Re Plaintiff's Motion For Partial Summary Judgment and for Modification of Pretrial Preparation Order**. In compliance with General Order 45.X.B, I hereby attest that each of the signatories above has concurred and authorized this filing.

Dated: January 30, 2014

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Koray J. Bulut
Koray J. Bulut

Attorneys for Defendants
SKS OCULAR, LLC, SKS OCULAR 1,
LLC, JASON SLAKTER, and GLENN
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